

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN DOES A, B, C, D, E, F, G, H,
MARY DOE and MARY ROE,
on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

File No. 2:22-cv-10209

Hon. Mark A. Goldsmith

GRETCHEN WHITMER, Governor of the
State of Michigan, and COL. JOSEPH
GASPER, Director of the Michigan State
Police, in their official capacities,

Mag. Curtis Ivy, Jr.

Defendants.

PLAINTIFFS' SECOND AMENDED LAY WITNESS LIST

Pursuant to agreement of the parties, Plaintiffs amend their witness list. Plaintiffs, by their attorneys, submit the following amended¹ list of people who may be called at trial as lay witnesses in this matter.

1. Mary Roe²
c/o counsel
American Civil Liberties Union Fund of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506

¹ In addition to adding witnesses, Plaintiffs have edited this list to reflect that Professor Larry Dubin is withdrawn as a witness.

² Pursuant to the protective order, ECF 88, the named plaintiffs, class members and their family members are identified by their pseudonyms.

2. Mary Doe
c/o counsel
American Civil Liberties Union Fund of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506
3. John Doe A
c/o counsel
American Civil Liberties Union Fund of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506
4. John Doe B
c/o counsel
American Civil Liberties Union Fund of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506
5. John Doe C
c/o counsel
American Civil Liberties Union Fund of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506
6. John Doe D
c/o counsel
American Civil Liberties Union Fund of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506
7. John Doe E
c/o counsel
American Civil Liberties Union Fund of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506
8. John Doe F
c/o counsel

American Civil Liberties Union Fund of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506

9. John Doe G

c/o counsel
American Civil Liberties Union Fund of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506

10. John Doe H

c/o counsel
American Civil Liberties Union Fund of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506

11. I.G., Spouse of John Doe C

c/o counsel
American Civil Liberties Union Fund of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506

12. B.W., Mother of John Doe E

c/o counsel
American Civil Liberties Union Fund of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506

13. Michigan State Police staff and former staff, including but not limited to staff and former staff of the Sex Offender Registry Unit and Sex Offender Enforcement Unit staff (including but not limited to Narcissa Morris, Sharon Jegla, Sgt. Brenda Hoffman, Jami Selden-Manor, Nicole McGhee and Steven Beatty), and any person named by Defendants to respond to Plaintiffs' deposition notice under Rule 30(b)(6).
Michigan State Police Headquarters
333 S. Grand Ave.
P.O. Box 30634

Lansing, MI 48909-0634

14. Corey Spickler

c/o counsel

Michigan Department of Attorney General

P.O. Box 30217

Lansing, MI 48909

15. James Kissinger

c/o counsel

Michigan Department of Attorney General

P.O. Box 30217

Lansing, MI 48909

16. Giancarlo Guzman

ACLU of Michigan

2966 Woodward Ave.

Detroit, MI 48201

17. Shelli Weisberg

ACLU of Michigan

2966 Woodward Ave.

Detroit, MI 48201

18. The Honorable William C. Buhl

c/o counsel

American Civil Liberties Union Fund of Michigan

1514 Wealthy SE, Suite 260

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19. Senator Jeffrey Irwin

Post Office Box 30036

Lansing, MI 48909-7536

20. A.C.

c/o counsel

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21. H.C.

c/o counsel

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1514 Wealthy SE, Suite 260
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22. P.F.

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1514 Wealthy SE, Suite 260
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23. R.H.

c/o counsel

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1514 Wealthy SE, Suite 260
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24. R.H.2.

c/o counsel

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1514 Wealthy SE, Suite 260
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25. A.J.

c/o counsel

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1514 Wealthy SE, Suite 260
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26. D.K.

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1514 Wealthy SE, Suite 260

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27. R.L.

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1514 Wealthy SE, Suite 260

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28. H.M.

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1514 Wealthy SE, Suite 260

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29. D.M.

c/o counsel

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30. J.M.

c/o counsel

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31. K.M.

c/o counsel

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1514 Wealthy SE, Suite 260

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32. K.N.

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1514 Wealthy SE, Suite 260

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33. G.O.

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1514 Wealthy SE, Suite 260

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34. T.P.

c/o counsel

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1514 Wealthy SE, Suite 260

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35. B.P.

c/o counsel

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36. M.R.

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1514 Wealthy SE, Suite 260

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37. T.R.

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1514 Wealthy SE, Suite 260

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38. J.S.

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39. A.S.

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40. K.S.

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1514 Wealthy SE, Suite 260
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41. E.S.

c/o counsel

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1514 Wealthy SE, Suite 260
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42. G.W.

c/o counsel

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1514 Wealthy SE, Suite 260
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43. K.W.

c/o counsel

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44. Nephew of Doe E

c/o counsel

American Civil Liberties Union Fund of Michigan
1514 Wealthy SE, Suite 260
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45. Elvira Hernandez
ACLU of Michigan
1514 Wealthy SE, Suite 260
Grand Rapids, MI 49506

46. Mariam Elbakr
ACLU of Michigan
2966 Woodward Ave.
Detroit, MI 48201

47. Timothy Fitzgerald
(517) 927-6661
One Energy Plaza
Jackson, MI 49201

48. All witnesses identified by the Defendants.

49. Any person who provides an affidavit or declaration in this case, or who is deposed in this case.

50. All witnesses needed to lay a foundation.

51. All necessary records custodians and witnesses who can provide testimony to authenticate and admit exhibits.

52. All witnesses needed for rebuttal.

53. Any witness that may be ascertained through discovery or investigation.

Plaintiffs reserve the right to amend this list as discovery is completed, up to and including the day of trial.

This witness list is intended to supplement Plaintiffs' initial disclosures under Rule 26.

Respectfully submitted,

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Dated: June 16, 2023

s/ Paul D. Reingold (P27594)
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